

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

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June 13, 2003

EMS  
Information Bulletin No. ID-2003-121

To: ICT/IMF

From: State Director

Subject: Idaho's Wild Horse and Burro (WH&B) Team

**Background:**

In FY 1999, the Idaho Corporate Team (ICT) established the WH&B "Core Team" to share and benefit from the specialized expertise of professional staff located in various offices across the state. The Core Team concept assigned functional leads to serve as technical experts for various aspects of Idaho's WH&B program and events. Additionally, the intent of the Core Team concept is to ensure safe and efficient implementation of WH&B activities, particularly gathers and adoptions.

The ICT's decision was due, in part, to a National initiative to achieve appropriate WH&B numbers across the public land by 2005. In addition to Idaho horses gathered and offered for adoption, the initiative required that horses and burros gathered from other states would be offered at "satellite" adoptions within Idaho. To facilitate those activities, as well as the continuing responsibilities associated with managing the six wild horse herds in Idaho, the Idaho WH&B Core Team was created.

**Current Situation:**

Over four years of operation as a Core Team have provided an opportunity to identify needed refinements or changes in the original structure and/or function of the Team. While most of the original strategy has proven effective, it has become apparent that the Team's responsibilities might best be divided into two major categories: (1) management of Idaho's herds, including gathers necessary to maintain appropriate management levels and (2) management of adoption events, both local and satellite. The need for Team members accustomed to working together in handling the horses at adoptions was identified as an important safety issue. Due to field office staffing changes, it became apparent that each of Idaho's Herd Management Areas should be

represented on the Core Team to participate in budget, facility, equipment, marketing, and other program management discussions.

On February 28, 2003, a WH&B Core Team meeting was held at the State Office. Following discussions regarding the roles and responsibilities of the Core Team Members, it was decided to revise the original draft "Idaho's Wild Horse and Burro Core Team," dated March 14, 2002, and develop an updated draft, "Idaho's Wild Horse and Burro Team Roles and Responsibilities." Since most Core Team and support team members are involved in both aspects of the WH&B Program, the word "core" was eliminated from the title of the Team. Law Enforcement was added to the list of functional leads since these events require an increasing level of security considerations. In addition, another horse wrangler was added so that there is a backup.

In the future, the team will be called "Idaho's Wild Horse and Burro Team." However, to minimize unnecessary impact to other workloads for which each Team member is responsible, some separation was made. In short, the "Adoption Team" consists of the functional leads (i.e., adoptions, gathers, herd management, public affairs, state lead, administration, and law enforcement), an additional administrative person, and three horse handlers. In other words, the entire team is normally involved with adoptions. The "Management Team" consists of the functional leads mentioned above and a representative for each Idaho herd. Functional leads may be called upon to address issues that are best handled with a small group and do not require the presence of the whole team. It is prudent logistically and financially to limit problem solving to those functional leads who are needed to properly address the issue, such as implementation of new Washington Office direction regarding gathers.

On April 29, 2003, a briefing for the State Director on the WH&B Program and the "New" WH&B Team was held at the State Office. Following the briefing, approval was given to finalize Idaho's WH&B Team.

A detailed description of the Team composition, the duties of each Team member, and roles of other key staff throughout the State are provided as an attachment. This document essentially serves as a charter for the Team.

Every year it becomes more difficult for managers to juggle priority workloads. However, the WH&B program is a highly visible national program that generates some of the most emotional public interest of any program in the BLM. The success of our efforts in Idaho depends heavily on the level of support each affected manager provides to his/her staff in their statewide WH&B duties.

To help further guide the Team's activities, operational plans will be developed for adoptions and gathers in late FY 2003. These plans will address safety issues, staffing contingencies, facility needs (including information regarding facilities that have been used in the past), WH&B "uniforms," public access and safety, and law enforcement. The operational plans will be appendices to the attached roles and responsibilities document to provide managers and future WH&B specialists, leads or team members the information necessary to understand the logistics

of the WH&B program in Idaho.

Your support for Idaho's WH&B Team is appreciated. If you have any questions regarding the Team, please contact Jon Foster at (208) 373-3813 or Tom Miles, WH&B Program Lead, at (208) 373-3804.

Signed  
Michael A. Ferguson  
for K Lynn Bennett

Authenticated  
Caureen Miller  
Staff Assistant, 930

Attachment

# Idaho's Wild Horse and Burro Team Roles and Responsibilities

June 4, 2003

## **General:**

This document describes the roles and responsibilities of Idaho's Wild Horse and Burro (WH&B) Team (Team). This Team was originally established in 1999 by the Idaho Corporate Team (ICT). Revisions to the Team makeup and roles and responsibilities were implemented and approved in 2003. The Team concept is to efficiently and safely implement and manage WH&B activities, particularly gathers and adoptions through: 1) functional leads that serve as technical experts for various aspects of Idaho's WH&B program and 2) support team members who support management and adoption efforts. The Team is represented at ICT meetings by a management representative who also represents ICT issues and concerns to the Team.

Functional leads are the true leads of the activity or event for which they are responsible. For example, the adoption lead is in charge of all adoptions, regardless of where the adoptions are being held. This program will be conducted similar to a wildfire situation where an incident commander is in charge of all aspects of a fire, so be it for the adoption lead. The same goes for gathers and herd management. The reason for this is that we want our best and most experienced people running these efforts so that they are run efficiently, safely, and there is no question of who is in charge. Local managers will be involved during events in their area or District by the functional lead similar to incident commanders keeping them involved with wildfires.

Demand for District people for these events is on an as needed basis. Administrative, law enforcement, labor, and horse handling support from District people may be needed depending on the event and the situation. Functional leads are responsible to ensure that all managers and their staff are kept informed of these needs well ahead of the event to eliminate conflicts in schedules. District staffs need to coordinate closely with the event lead to ensure that support at the event is adequate but not excessive.

Selection of locations to host satellite adoptions, and scheduling of those adoptions, is coordinated by the Adoption Team Lead and State Lead with the appropriate District Manager to ensure highly successful adoptions. Based on past experiences and marketing strategies these locations vary from year to year.

To minimize costs to the 1060 program all labor, including overtime for participants at events will be covered by the participant's home office according to their AWP. Travel (per diem) will be covered by the State Office Division of Resource Services (ID-930).

A minimum of one Team meeting will be held annually to address program and Team issues. The meeting will normally be held in February or after directives and budget have been provided to the SO.

A closeout by participants will be held following each adoption or gathering event. This closeout will be held prior to participants leaving for their home office. The purpose of the closeout is to

evaluate how well the event went and any improvements needed to be more successful, efficient, and safe.

Operational plans will be developed for adoptions and gathers following FY 2003. These plans will include safety, staffing contingencies, facility needs (also information regarding facilities that have been used in past), WH&B “uniforms,” public access and safety, marketing, and law enforcement. The operational plans will be appendices to this document to provide managers and future WH&B specialists, leads, or Team members the information necessary to understand the logistics of the WH&B program in Idaho.

### **Team Roles, Responsibilities, and Assignments:**

#### **Management:**

Management/ICT Representative

Fritz Rennebaum: UCSC District

#### **Functional Leads:**

State Coordinator

Tom Miles: ISO 931

Public Affairs

Kathe Rhodes: UCSC District

Jerry Rohnert: ISO 912

Adoptions

Mike Courtney: LSRD, Jarbidge F.O.

Gathers

Kent Benson: USRD, Burley F.O.

Herd Management (LSRD Herd Mgmt Lead)

Sam Mattise: LSRD, Owyhee F.O.

Administration

Joan Howard: LSRD, Owyhee F.O.

Law Enforcement

Joe Leaf: ISO

#### **Support Team Members:**

Challis Herd Management Lead

Leigh Redick: UCSC, Challis F.O.

Horse Handler

Jake Vialpando: LSRD, Owyhee F.O.

Horse Handler

Delbert “Rawhide” Clark: UCSC, Challis F.O.

Horse Handler

Roger Cada: LSRD, Operations.

<b>MANAGEMENT/ICT REPRESENTATIVE – Fritz Rennebaum</b>	
State Level	
1. Represents the WH&B Team’s interests, issues, etc. to Idaho Management	
2. Represents Idaho Management issues and concerns to the WH&B Team	
<b>STATE COORDINATOR – Tom Miles</b>	

National Level	State Level
1. Represents Idaho in National meetings and National Program Office (NPO) conference calls.	1. Coordinates the preparation of the 1060 (WH&B), Planning Target Allocations (PTA), Annual Work Plan (AWP), and program profile.
2. Coordinates with National/State program leads on all WH&B issues regarding the program in Idaho.	2. Coordinates the gathering, adoption, management, and administrative activities with functional leads to assure a focal point of contact.
3. Coordinates Idaho's review of proposed Program Policy initiated from the NPO.	3. Collects the needs (from the functional leads) for acquisition of equipment to conduct the various operational requirements of the 1060 program (e.g., trucks, panels, safety gear, chutes, trailers)
4. Serves as the Idaho single contact regarding the in-state flow of information.	4. Coordinates with the Herd Management Lead (HML) to keep informed on management strategies and herd problems in all Herd Management Areas (HMA's).
5. Attends National program meetings and conferences/workshops. Distributes information, policy, and guidance acquired to the State WH&B functional leads.	5. Coordinates with the HML to assure Appropriate Management Levels (AML's) are established on all HMA's.
	6. Distributes and interprets litigation decisions to Team members and disseminates information on new IBLA or court rulings that would affect planning documents, herd management, and resource management in HMA's.
	7. Coordinates AWP objectives with the HML for Idaho HMA's.
	8. Coordinates with, and submits information to the Management/ICT representative as appropriate for informing ICT.

	9. Coordinates use/borrowing of needed equipment (from other States) to conduct gatherings and adoptions as identified by the functional leads.
	10. Receives all records/files coming from other states and routes them to the correct office of jurisdiction.
<b>PUBLIC AFFAIRS (PA) LEADS– Kathe Rhodes (State) &amp; Jerry Rohnert (National)</b>	
National/Marketing (Jerry Rohnert - ISO)	State/Adoptions (Kathe Rhodes, UCSC)
1. Participate in National meetings as funding allows, providing for networking and information exchange.	1. Participates in National meetings as funding allows providing for networking and information exchange.
2. Coordinates with WO on any national issues or controversies requiring public affairs attention.	2. Assists State Office Public Affairs Officer (PAO) in promoting individual events within Idaho. Coordinates with District PAOs for event outreach.
3. Markets and promotes Idaho WH&B Program on a national and statewide level.	3. Responsible for all on-site PA activities such as on-site information (brochures), media interviews, local coordination with PAO, etc.
4. Represents WH&B interests with ISO External Affairs activities.	4. Coordinates on-site public and media activities associated with wild horse gathers, ensuring consultation with local/District PAO.
5. Coordinates with District/Field Office staff to incorporate local success stories into outreach strategies.	5. Assists State Team Members in management of Idaho's WH&B Program by responding to requests for information or support.
6. Updates displays for “expos” etc. as necessary to promote BLM's WH&B program.	6. Facilitator at State WH&B Meetings.

7. Procures posters, trinkets, and other articles for use as promotional material at adoptions, expos, and other public events.	7. (See itemized listing included with Adoption Lead duties for activities performed at adoption events.)
8. Responsible for all pre-activity PA work such as ads, press releases, flyers, media contacts (radio, newspapers, magazines, and TV).	
9. Prepares notice announcing meeting on the use of helicopters and motor vehicles during gathers, and ensures publication of the notice consistent with DOI policy.	
<b>ADOPTION LEAD – Mike Courtney</b>	
National Level	State Level
1. Participates in National meetings as funding allows for networking and information exchange.	1. Coordinates satellite location selections with District and Field Office (FO) Managers.
2. Coordinates satellite location selections with other states to avoid conflicting dates.	2. Coordinates logistical needs for all adoptions, with support from other team members and local FO staff (*see below for specifics).
3. Participates on National Adoption Team.	3. Identifies budget needs pertaining to adoption activities.
	4. Coordinates with FO Manager and local WH&B Lead on operational plan for the adoption
	5. Provides opportunities for local District staff to shadow jobs where appropriate.
	6. Coordinates use/borrowing of needed equipment (from other States) with State Coordinator to conduct adoptions as identified by the Team functional leads.
	7. Coordinates selection of satellite adoption locations with the WH&B Team, ICT Representative, District and FO Managers.

\***ADOPTION LEAD** specific responsibilities pertaining to adoption events: (Although some of the following



duties are performed by other Team members or local Field Office wild horse coordinators, the Adoption Lead is ultimately responsible for their accomplishment.)

- Coordinate procurement of facilities with local FO staff.
- Assess equipment needs at site, usually involving travel to site prior to event.
- Assure adequate vehicle accommodation and loading areas at event site that are drained, paved, or graveled.
- Assure (usually through other Team members) availability of public address system, a covered (out of inclement weather) space with chairs and tables for processing administrative functions, radios for communicating between admin/corrals/loading/parking/law enforcement.
- Assure completion of Incident/Disaster Information Response form prior to each event. The form contains local emergency phone numbers and other critical emergency information. Distribute completed form to all participants prior to each event.
- Assure a veterinarian is on call and health certificates for animals crossing state lines are completed.
- Assure that a brand inspector is present to inspect animals crossing state lines.
- Assure that all facilities/pens have adequate locking capability.
- Coordinates with law enforcement to ensure appropriate law enforcement/security is present at all times while horses are on site.
- Arrange for animal rendering, including facilities, when necessary.
- Procure a trainer for adoption events.
- Coordinate with the National Program Office to reserve the appropriate number and type of hoses/burros needed, and arrange for shipment to adoption site and return of unadopted animals.
- Assure that all equipment is present at each event necessary to carry out the event (e.g., administration trailer with chairs, tables, and tent; chutes, panels and gates, horse trailers; bid boards).
- Assure feed (hay) and water are present at adoption site.
- Responsible for holding, shipping, and receiving of animals for satellite adoptions.
- Procure adoption facility with adequate parking, corral areas, and access.

**Other detailed activities performed by Team members during adoption events:**

- Preparation of forms for each event, including numerical animal listing for handouts, bid sheets, bid receipts, master “plotter” board (J. Howard).
- Receive horses/burros safely off truck and verify gross numbers (M. Courtney).
- Create corral layout to support safe handling, sorting and keeping of the horses, safe access by the public, and a round pen for use by the trainer (Delbert “Rawhide” Clark and Roger Cada).
- Set up (and tear down) panels to create round pen for trainer and pens/corrals for horses and burros (All).
- Sort horses by sex, age, and pen size immediately after arrival off truck (J. Vialpando, Rawhide Clark, S. Mattise, and Roger Cada).
- Ensure horses have adequate feed and water throughout the event (J. Vialpando, and others).
- Assure that horses delivered to the event are consistent with health records accompanying them and immediately contact shipping facility of any discrepancies (J. Howard).
- Manage public and media activities at the event. Participate in outreach opportunities the few days prior to the events such as radio talk shows or interviews. (K. Rhodes).
- Complete Pen Lists for sorted pens, posted as soon after sorting as possible (K. Rhodes).
- Post clipboards/bid sheets/markers, by horse number and pen, prior to bidding (K. Rhodes).
- Recruit bid board monitors assigned to each pen during bidding (K. Rhodes).
- Hang bid boards (All).
- Test public address system, etc. (S. Mattise).
- Serve as Master of Ceremonies for bid initiation and bid awards (S. Mattise).
- Explain bidding, paperwork, and loading process to public and initiate the timed bidding opportunity

(S. Mattise).

- Collect bid sheets after bidding opportunity closes and confirm final/successful bids (S. Mattise, with assistance from J. Howard's designee).
- Assure that plenty of adoption brochures and applications are at event (J. Howard).
- Oversee all administrative activities at the event, including managing money and receipts, accurately completing Private Maintenance and Care Agreements (PMACA) forms, accurately recording bid awards and transferring appropriate information to bid receipts; providing the necessary office supplies, and timely submission of event information to the National Office (J. Howard).
- Assure at least one person, usually two, are available to complete and sign PMACAs immediately following bid awards (J. Howard).
- Assure at least one collections officer is available to collect payment for the animals (J. Howard).
- Record successful bids, identified by horse number and bidder number (J. Howard's designee).
- Record successful bids on master "plotter" board for tracking during the event (M. Courtney).
- Complete loading paperwork sufficient to ensure that the correct horse is identified with the appropriate adopter for loading. Coordinate out-of-state loading with brand inspector and veterinarian. (K. Rhodes).
- Sort animals for loading after successful bids are awarded (Rawhide Clark and Roger Cada).
- Load animals into trailers, including haltering as requested by adopters (K. Benson, S. Mattise, M. Courtney, and Jake Vialpando).
- Monitor public activities (e.g. climbing on fences, taunting animals) around the pens to ensure safety for both the animals and the public (all).
- Monitor activities from security/law enforcement aspect (Ranger).
- Receive receipts for gelding expenses and provide reimbursement up to \$50 to the adopter. Proper fund coding to be determined by State Lead. (Joan Howard).

<b>GATHER LEAD – Kent Benson</b>	
Gathering Preparation & Gather Operations	Post-Gather Preparation and Holding Facilities
1. Arrange for adequate gathering crew by identifying expertise, numbers, availability and secure personnel.	1. Assure corrals are in good repair and functional.
2. Coordinate with PA (Jerry Rohnert) on notice announcing meeting on the use of helicopters and motor vehicles during gather, and ensure publication of the notice consistent with DOI policy.	2. Oversee preparation of horses for adoption, including branding and veterinary care. Coordinate assistance from Team members for preparation process, and solicit help from local office as needed.
3. Assure availability and adequacy of gather plan, EA (in coordination with State Herd Management Lead and local WH&B specialist), and helicopter plan.	3. Assure appropriate identification tags and neck ropes are available for horse preparation.
4. Coordinate with WH&B PAO (Kathy Rhodes) to announce gather in local media.	4. Assure that holding facility has appropriate locking capability.
5. Select and maintain gather facilities.	5. Coordinate timely completion of gather and preparation with State Lead, Adoption Lead, and Public Affairs to provide adoption of horses.
6. Assure adequate crew at the corrals to handle gathered horses.	6. (See itemized listing included with Adoption Lead duties for activities performed at adoption events.)

7. Locate trap sites and assure access.	7. Coordinates use/borrowing of needed equipment (from other States) with State Coordinator to conduct gatherings as identified by the Team functional leads.
8. Prepare for overtime and travel request processing for participants.	8. Participate in National meetings as funding allows for networking and information exchange.
9. Assess equipment needs and availability - coordinate with State Lead to acquire equipment as determined to be necessary.	
10. Coordinate with local FO manager and with local Field Office specialist regarding logistics such as radios, administrative support, and sanitation facilities as necessary.	
11. Assure that a veterinarian is on-site during gather activities.	
12. Coordinate all gather activities with gather crew.	
13. Coordinate management of public on-site at gather with on-site PAO to ensure safety of both public and horses.	
14. Provide opportunities for local District employees to shadow jobs where appropriate.	

#### **HERD MANAGEMENT LEAD – Sam Mattise**

National Level	State Level
1. Participates in National meetings as funding allows for networking and information exchange, and to gain information concerning herd management techniques, including anticipated success rates of each.	1. Coordinates census operations on all HMAs and reports findings to the State Lead (to be forwarded to the National Office).
	2. Coordinates with State Lead to keep informed on changes in management strategies or herd problems in HMAs.
	3. Coordinates with line managers and local WH&B staff to ensure establishment of AML of all Idaho HMAs.

	4. Coordinates with local WH&B staff to review HMPs and assists local WH&B staff on revisions as necessary to be consistent with national and State policy.
	5. Assists local WH&B staff on reviews of Allotment Management Plans, Analysis, Interpretation, and Evaluations, Resource Management Plans, and other documents pertaining to management of HMAs to ensure consistency in herd management strategies.
	6. Coordinates with local WH&B staff to assure that impacts to wild horses and the HMAs from projects are adequately addressed in NEPA documents.
	7. Develops (in coordination with LE) an action plan to address illegal taking of horses that would utilize assistance from local and State law enforcement agencies.
	8. Identify AWP objectives for herd management for all HMAs and submit to State Lead for review and distribution to local BLM offices.
	9. Participates in all wild horse and burro adoptions and gathers in Idaho.
	10. (See itemized listing included with Adoption Lead duties for activities performed at adoption events.)

#### **ADMINISTRATION LEAD - Joan Howard**

##### State Level

1. Participate in National meetings as funding allows for networking and information exchange.
2. Manages administrative/paperwork/collections functions associated with all Idaho adoptions. (See below for detailed list of tasks.)\*\*

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| 3. Inputs shipping and death records for horses/burros offered at Idaho satellite adoptions that are not successfully adopted. (Records for adopted animals will be input by hosting office.) |
| 4. Participates in national or state conference calls as necessary  |
| 5. Receives all Letters of Eligibility for Title forms from adopters and forwards them to the office of jurisdiction.   |

\*\* Below is a detailed list of adoption event duties performed by the Administration Lead:

- Notify hosting District of satellite adoptions to request change-making fund of \$200 for adoption from Denver.
- Request two collection officers from hosting office to perform collection duties during adoption.
- Provide two “paid” stamps; one “paid by credit card” stamp, and a manual credit card machine with debit and credit slips.
- Set up administrative/office site prior to adoption.
- Prepare bidding/bid award forms prior to adoptions, using a merge process to print numbers of horses/burros being offered at each adoption. Those forms include public handout showing all offered horses by identifying number, bid sheets, bid receipts, master “plotter” page. In addition to merged forms, provides sufficient supply of PMACA forms, receipts, pen list forms, gelding vouchers, adoption brochures and blank applications.
- Prepare adopter packets which include brand inspection information, individual health records, gelding voucher for stallions, and other information as determined to be appropriate.
- Ensure that a change making fund is under dual control, by both the collection officers and law enforcement.
- Ensure that PMACAs and collections information is reconciled at the end of each adoption event.
- Follow-up to ensure that collections are deposited by local collections officer into the correct account.
- Ensure that bid receipts are completed correctly.
- Provide adoption paperwork to hosting office. Hosting office will then prepare folders (by adopter), input necessary WHBIS information, and forward folders to appropriate offices of jurisdiction.
- Prepare official reporting form for WO and send adoption data via e-mail within 48 hours of each adoption event.
- Ensure adequate office supplies are available for adoption (e.g., pens, staplers with staples, tape, paper clips).

<b>Law Enforcement Lead – Joe Leaf</b>
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State Level
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| 1. Prepares law enforcement operational plans for adoption and gather events.  |
| 2. Coordinates with District/Field office managers, LEOs, and local law enforcement regarding law enforcement operational plans for events.              |
| 3. Briefs on-site PAO, prior to and during the event, of law enforcement plans and concerns.   |
| 4. Responsible for all aspects of law enforcement at events including; personnel needs, equipment needs, and shifts.                                     |
| 5. Responsible for investigating potential threats to the event based on the location of the event near home bases to radical groups or terrorist cells. |
| 6. Assists (in coordination with the Herd Management lead) in the development of an action plan to address illegal taking of wild horses.                |

<b>Horse Handlers – Jake Vialpando; Delbert “Rawhide” Clark; Roger Cada</b>
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State Level
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| 1. Attends all adoptions to ensure expertise for horse handling such as sorting, feeding, and facility set up. |
| 2. Responsible for facility layout and design in coordination with Adoption Functional Lead.                   |

<b>LOCAL (DISTRICT/FIELD OFFICE) WH&amp;B LEADS - adoption responsibilities normally performed during the few weeks prior to each adoption event, or following the event, with close coordination with the State Adoption Lead.</b>
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| 1. Provides sanitation facilities for the public.   |
| 2. Arranges for veterinarian and brand inspector.   |
| 3. Provides radios for communication during adoption/gather event.  |
| 4. As hosting office, inputs required information into the Wild Horse and Burro Information System (WHBIS) for each horse or burro adopted. Input will be completed within BLM’s required timeframes. Prepares folder for each animal containing Private Maintenance and Care Agreement, health records, approved application with attachments, and any other appropriate information and sends to the applicable office of jurisdiction. |
| 5. Maintains “adopter” file for each adopter and horse/burro within the office’s area of jurisdiction.  |
| 6. Conducts and documents compliance checks, issues titles for private ownership, and otherwise maintains files pertaining to WH&B management.  |
| 7. When horses are being held in local facilities (usually post-gather) provides for feeding, security, and other needs of animals. (Boise and Challis)   |
| 8. For local (Idaho horses) gathers and adoptions, coordinates with Team to provide staff assistance during preparation and holding of animals prior to adoption or transport to another site.  |
| 9. Prepares and submits funding requests for HMA related projects.  |
| 10. Coordinates implementation of herd management projects in HMAs.   |
| 11. Coordinates monitoring and ascertains impacts from all public land uses in HMAs (e.g. livestock, OHV, special use permit events, wildlife, etc.)  |
| 12. Identifies mitigation measures needed to ensure herd integrity and practical population dynamics in HMAs.   |
| 13. Coordinates with BLM law enforcement staff to ensure appropriate surveillance and monitoring of access routes in HMAs to address illegal taking of horses.  |